IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MARIA DE LA CRUZ ROMERO MARTINEZ

DEBTOR

CASE NO 15-03199-BKT

CHAPTER 13

## DEBTOR'S MOTION TO EXCUSE FILING OF UNABLE PAYMENT ADVICES PURSUANT TO 11 USC SECTION 521(a)(1)(B)(iv)

TO THE HONORABLE COURT:

**NOW COMES, MARIA DE LA CRUZ ROMERO MARTINEZ,** debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On April 30, 2015, the debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code, 11 U.S.C. §§1301 *et seq.*

2. At the time the petition was filed, debtor was able to locate most of the pay stubs from her employer (PR Education Department) covering the period one hundred eighty (180) days before the petition date.

3. Despite the debtor's best efforts, she has been unable to find all of her pay stubs for the entire one-hundred-eighty-day prepetition period. The missing semi-monthly pay stubs are for the following dates: 10/30/2014, 11/30/2014, 2/15/2014, 3/30/2014 and 4/15/2015. The debtor has submitted to the Trustee all other pay stubs for the entire one-hundred-eighty-day prepetition period.

4. The debtor requested that her employer provide copies of the missing pay stubs, but the employer has refused to provide them.

5. Furthermore, the debtor has tried to get the missing pay stubs at the school in which she works, at the PR Education Department's central offices in Hato Rey, at the *"Region Educativa*

*Caguas Sur"*, at the *"Distrito Escolar"* in Gurabo, and finally at the PR Treasury Department in San

Juan, however, she has been unable to get the missing pay stubs.

6. The debtor was employed by the same employer for the entire sixty-day prepetition period.

Attached is the last pay stub received by the debtor before filing this bankruptcy case. This pay stub

is for the period ending April 30, 2015, and it includes a year-to-date total of all income received by

the debtor prior to filing the petition.

7. This Court has authority pursuant to section 521(a)(1)(B) to modify the filing requirements

under that section.

**WHEREFORE**, debtor respectfully requests this Honorable Court to Order that the debtor

be permitted to complete this case without submitting all payment advices required by 11 U.S.C.

521(a)(1)(B)(iv).

**I CERTIFY**, that on this same date a copy of this Notice was filed with the Clerk of the

Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, the US

Trustee's Office, and all CM/ECF participants; I also certify that a copy of this notice was sent via

regular US mail to the debtor to her address of record; and to all creditors and interested parties, in

the above captioned case.

## NOTICE

**Within fourteen (14) days after service as evidenced by the certification, and an additional three
(3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this
paper has been served, or any other party to the action who objects to the relief sought herein, shall
serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S.
Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the
time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested
relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the
Court, the interest of justice requires otherwise.**

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 26th day of June, 2015.

*/s/Roberto Figueroa Carrasquillo*
ROBERTO FIGUEROA CARRASQUILLO
Attorney for Debtor
USDC #203614
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

| Grupo de Pago: | SM -Quincenal | Aviso #: | 5867140 |
|---|---|---|---|
| Desde: | 04/20/2015 | Fecha Aviso: | 04/30/2015 |
| Hasta: | 05/01/2015 | | |

| **MARIA DE LA C ROMERO MARTINEZ**<br>CALLE PICAFLOR  #G-8  BOX 158<br>URB. REPARTO SAN JOSE<br>CAGUAS, PR  00725<br>SS:  XXX-XX-2012 | # Empleado: XXXXX2012<br>Dept: 8002125-CAGUAS-CAGUAS II<br>Lugar: JUSTINA VAZQUEZ MENDOZA<br>Titulo: DEPARTAMENTO DE EDUCACION<br>Sueldo: $2,830.00 Monthly | DATA IMP: Federal PR<br>Estado Civil: Married Married<br>Concesiones: 0 2<br>Pct. Adcl.:<br>Cant. Adcl.: |
|---|---|---|

### HORAS E INGRESOS

| Descripcion | Sueldo | Corriente Horas | Corriente Ingresos | Acumulado Horas | Acumulado Ingresos |
|---|---|---|---|---|---|
| Pago de Salarios Regulares | | | 1,415.00 | 492.00 | 11,320.00 |
| Total: | | | 1,415.00 | 492.00 | 11,320.00 |

### IMPUESTOS

| Descripcion | Corriente | Acumulado |
|---|---|---|
| Fed FICA Med Hospital Ins / EE | 20.52 | 164.14 |
| PR Withholding | 24.89 | 199.12 |
| Total: | 45.41 | 363.26 |

### DEDUCCIONES

| Descripcion | Corriente | Acumulado |
|---|---|---|
| GPR Plan de Retiro de Maestro | 127.35 | 1,018.80 |
| Total: | 127.35 | 1,018.80 |

### DEDUCCIONES GENERALES

| Descripcion | Corriente | Acumulado |
|---|---|---|
| RM-Prest Pers De Cuota-Ret Mae | 213.89 | 1,711.12 |
| SC-AMER FAM LIFE ASS CO | 0.00 | 89.25 |
| Total: | 213.89 | 1,800.37 |

### BENEFICIOS PATRONALES PAGADOS

| Descripcion | Corriente | Acumulado |
|---|---|---|
| GPR Plan de Retiro de Maestro | 120.28 | 962.24 |
| FSED Disability Plan | 24.06 | 192.48 |
| * Tributable | | |

| | TOTAL BRUTO | BRUTO TRIBUT FED | TOTAL IMPUESTOS | DEDUCCIONES TOTALES | PAGA NETA |
|---|---|---|---|---|---|
| Corriente: | 1,415.00 | 0.00 | 45.41 | 341.24 | 1,028.35 |
| Acumulado: | 11,320.00 | 0.00 | 363.26 | 2,819.17 | 8,137.57 |

### PTO HORAS ACUM

| | |
|---|---|
| Balance Inicial: | 0.0 |
| + Ganada: | |
| + Compra: | |
| - Usada: | |
| - Donada: | |
| + Ajustes: | |
| Balance Final: | 0.0 |

### DISTRIBUCION PAGA NETA

| | |
|---|---|
| Aviso #5867140 | 1,028.35 |
| Total: | 1,028.35 |

**MENSAJE:** HAZ DE TU FAMILIA TU MEJOR PROYECTO DE VIDA. ORIENTATE. DEPARTAMENTO DE LA FAMILIA: 1-888-359-7777

**DEPT DE EDUCACION-MAESTROS**
Avenida Teniente Cesar Gonzalez
Esquina Calaf
HATO REY, PR  00919

Fecha
**04/30/2015**

Aviso No.
**5867140**

**Cant. Deposito:**    **$1,028.35**

A la
Cuenta(s) De

**MARIA DE LA C ROMERO MARTINEZ**
CALLE PICAFLOR  #G-8  BOX 158
URB. REPARTO SAN JOSE
CAGUAS, PR  00725
Localizacion: JUSTINA VAZQUEZ MENDOZA

### DISTRIBUCION DE DEPOSITO DIRECTO

| Tipo de Cuenta | Numero de Cuenta | Cant. Deposito |
|---|---|---|
| Checking | XXXXXXXXXXXXXXX | 1,028.35 |
| Total: | | 1,028.35 |

# NO-NEGOCIABLE